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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master Case No. 3:07-cv-5944-SC
MDL No. 1917

This Document Relates to:

**DECLARATION OF MICHAEL BRODY
IN SUPPORT OF MOTION FOR
EXTENSION OF TIME FOR THE
MITSUBISHI ELECTRIC DEFENDANTS
TO OBJECT TO THE SPECIAL
MASTER'S ORDER [DKT. 4802]**

*Crago, d/b/a/ Dash Comp., Inc. et al. v.
Mitsubishi Elec. Corp. et al.*, No. 14-CV-
02058 SC

Judge: Hon. Jon Tigar

DECLARATION OF MICHAEL BRODY

1. On September 2, 2016, Terry Truax and I placed a call to Rick Saveri, counsel for the DPPs, in order to request that the DPPs stipulate to extend the time to file Mitsubishi Electric's objections to the Special Master's Order, Dkt. #4802, until October 7, 2016. Mr. Saveri was not available and Mr. Truax and I left a message requesting a return call.
2. On September 6, 2016, Mr. Saveri returned my call. I spoke with Mr. Saveri and requested that the DPPs stipulate to extend the time to file objections to the Special Master's Order. Mr. Saveri advised me that he needed until the following day to consult with his co-counsel about the extension request.
3. On September 7, 2016, Mr. Saveri informed me that the DPPs did not agree to an extension until October 7, but would stipulate to an extension until September 23.
4. Mitsubishi Electric is currently working diligently to comply with Judge Walker's directives by the September 30, 2016 deadline. It is performing extensive searches for documents and is conducting numerous interviews of individuals in Japan. Multiple Jenner & Block attorneys are working on Mitsubishi Electric's compliance efforts.
5. The Jenner & Block attorneys who are working on Mitsubishi Electric's compliance efforts are the same attorneys who would provide critical support and institutional knowledge in support of Mitsubishi Electric's preparation of objections. If Mitsubishi Electric faces a September 23 deadline (as agreed-to by the DPPs), those attorneys will divert their attention to Mitsubishi Electric's objections, jeopardizing its compliance efforts.
6. Moreover, Mitsubishi Electric's compliance efforts will not be complete by September 23, and Mitsubishi Electric will therefore be unable to offer an accurate

1 report of those efforts to the Court as part of its objections, even though those efforts
2 may be pertinent to its objections.

3 7. Mitsubishi Electric has requested an October 7 deadline because certain outside
5 counsel attorneys for Mitsubishi Electric observe Rosh Hashanah on October 3-4.

6 8. I have been informed that on September 8, 2016 Mr. Truax contacted Mr. Saveri
7 and the Direct Purchaser Plaintiffs have agreed that, while they object to the
8 requested extension, in light of the September 13, 2016 deadline for filing
9 objections to the recent Order, this motion for an extension of time may be heard
10 on an expedited basis. Plaintiffs have stated that they will file a response by 1:00
11 p.m. on Friday, September 9.

12
13 I, Michael Brody, declare under penalty of perjury that the foregoing is true and correct.

14 Executed on September 8, 2016.

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17 /s/ Michael T. Brody
Michael T. Brody
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